UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated,

Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO: ALL ACTIONS

STIPULATION AND [PROPOSED] ORDER1

This Stipulation and Agreement, dated July [24th], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Johnny Robinson and Anthony Ron Yary (ECF No. 6533);

WHEREAS, Johnny Robinson and Anthony Ron Yary have since submitted written requests seeking to revoke their Opt Out requests (*see* Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Johnny Robinson and Anthony Ron Yary, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program;

AND NOW, this [14] day of July, 2017, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Johnny Robinson and Anthony Ron Yary are accepted, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program.

It is so STIPULA	ATED AND AGR			
By:		By: Brad Date: July	S. Kaup	D
Date: July 24, 2	2017	Date: July	24,2017	<u> </u>
Christopher Seeger		Brad S. Karp		
SEEGER WEISS LLP		PAUL, WEISS, RIFKIND, WHARTON		
77 Water Street & GARRISON LLP				
New York, NY 10005				
Phone: (212) 584-0700		New York, NY 10019-6064		
cseeger@seegerweiss.com		Phone: (212) 373-3000		
		bkarp@paulw	eiss.com	
Class Counsel		Counsel for t	he NFL Part	ties
Declaration of Orran L. Robinson and Anthony DIRECTED to post a re	Ron Yary are	the revocation r	equests subr	nitted by Johnny Administrator is
Anthony Ron Yary.			C	·
		ANITA B. BR	ODY, J.	
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